

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED

FILED

JUL 27 2022

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
 Plaintiff,)) No.
 v.)
)
 MATTHEW SABIR,))
)
 Defendant.)

4:22-cr-00417-RWS/SPM

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about June 22, 2022, in the County of St. Louis, within the Eastern District of Missouri,

MATTHEW SABIR,

the Defendant herein, did knowingly obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant unlawfully did take and obtain property consisting of United States currency from the presence of an employee of White Castle located at 7380 Olive Boulevard, University City, Missouri, against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees' person, that is, by pointing a firearm at the employees.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

The Grand Jury further charges that:

On or about June 22, 2022, in the County of St. Louis, within the Eastern District of Missouri,

MATTHEW SABIR,

the Defendant herein, knowingly possessed and brandished a firearm, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, obstruct, delay, or affect commerce by robbery as charged in Count One herein.

In violation of Title 18, United States Code, Sections 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE

The Grand Jury further charges that:

On or about June 23, 2022, in the County of St. Louis, within the Eastern District of Missouri,

MATTHEW SABIR,

the Defendant herein, did knowingly obstruct, delay and affect commerce, and attempt to obstruct delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant unlawfully did attempt to take and obtain property consisting of United States currency from the presence of an employee of BP Gas Station located at 4403 North Hanley, Berkeley, Missouri, against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees' person, that is, by pointing a firearm at the employees.

In violation of Title 18, United States Code, Section 1951(a).

COUNT FOUR

The Grand Jury further charges that:

On or about June 23, 2022, in the County of St. Louis, within the Eastern District of Missouri,

MATTHEW SABIR,

the Defendant herein, did knowingly obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant unlawfully did take and obtain property consisting of a wet floor sign from the presence of an employee of White Castle located at 7380 Olive Boulevard, University City, Missouri, against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees' person, that is, by discharging a firearm at the employees.

In violation of Title 18, United States Code, Section 1951(a).

COUNT FIVE

The Grand Jury further charges that:

On or about June 23, 2022, in the County of St. Louis, within the Eastern District of Missouri,

MATTHEW SABIR,

the Defendant herein, knowingly possessed and discharged a firearm, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, to obstruct, delay, or affect commerce by robbery as charged in Count Four herein.

In violation of Title 18, United States Code, Sections 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(iii).

A TRUE BILL

FOREPERSON

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